

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LIBERTY MUTUAL INSURANCE COMPANY,)	CIVIL ACTION
)	NO. 96-10804-DPW
)	NO. 1:04-CV-10969-DPW
Plaintiff,)	(Sutton Brook)
)	
v.)	
)	
THE BLACK & DECKER CORPORATION,)	
BLACK & DECKER, INC., BLACK & DECKER)	
(U.S.) INC., EMHART CORPORATION, and)	
EMHART INDUSTRIES, INC.,)	
)	
Defendants.)	

**ASSENTED TO MOTION FOR LEAVE TO FILE UNDER SEAL
BLACK & DECKER'S OPPOSITION TO LIBERTY MUTUAL
INSURANCE COMPANY'S MOTION FOR SUMMARY JUDGMENT
WITH RESPECT TO THE SUTTON BROOK LANDFILL SITE**

Black & Decker, with the assent of Liberty Mutual, moves, pursuant to Local Rule 7.2, for leave to file under seal Black & Decker's Opposition To Liberty Mutual Insurance Company's Motion For Summary Judgment With Respect To The Sutton Brook Landfill Site. This opposition responds to Liberty Mutual filings which themselves were filed under seal. Pursuant to Local Rule 7.2, Black & Decker requests that this Court enter an Order authorizing the sealing of this memorandum, filed in connection with its opposition to Liberty Mutual's summary judgment motion.

Black & Decker also requests that the Court maintain this document under seal until this action is closed and, thereafter, that this document be returned to counsel.

By their attorneys,

Dated: December 22, 2004

/s/ Jack R. Pirozzolo

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